

August XX, 2017

The Honorable Tom Price, Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Secretary Price:

The undersigned organizations appreciate the opportunity to comment on Massachusetts' proposed amendment to its 1115 Demonstration Waiver, known as MassHealth.

In the amendment, Massachusetts proposes to eliminate coverage of non-emergency medical transportation (NEMT), except for transportation to Substance Use Disorders (SUD) services, offered through the CarePlus program, which covers the expansion / new adult group. The state rightly states that NEMT is a valuable service for patients needing access substance abuse services but provides no explanation for why CarePlus should not cover access to other services.

Medicaid patients with the highest need for chronic services, including those diagnosed with cancer, mental health, HIV and end-stage renal disease account for more than half of Medicaid transportation utilization (see chart below) and these patients face the greatest transportation barriers to receiving healthcare. Without NEMT, patients will be unable to access critical treatment, resulting in increased Medicaid expenditures for more expensive services such as catastrophic hospitalization or institutionalization.

A study for the Transportation Research Board (TRB) of the National Academies found that if access to NEMT services saved only 1 hospitalization in 100 trips, the return on investment (ROI) would be 10 to 1. A similar study conducted by Florida State University found NEMT's ROI factor to be 11 to 1. Citing both studies, The Stephen Group (TSG) recommended that Arkansas retain NEMT for the Medicaid population. The Governor of Arkansas subsequently dropped his request to drop NEMT for the Medicaid expansion population.

Section 1115 of the Social Security Act gives the Secretary of Health and Human Services authority to approve demonstration projects that promote the objectives of the Medicaid program. Massachusetts' request to eliminate NEMT does not promote the objectives of the Medicaid program and includes no evaluation of the policy as required by Section 1115.

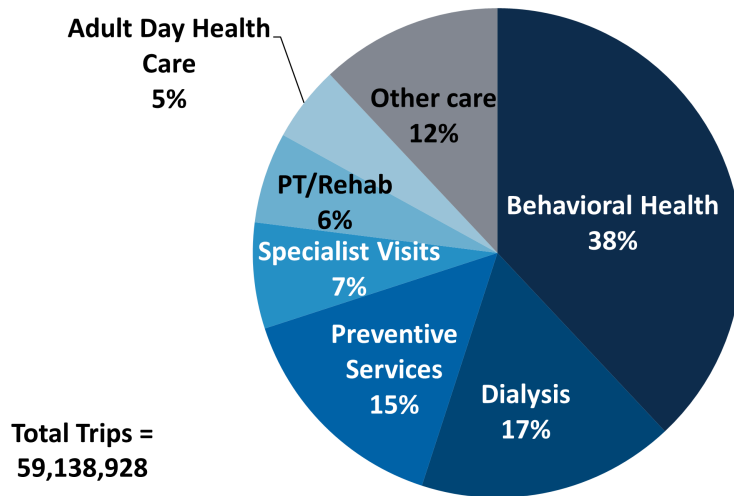
We urge you to reject this element of the amendment and provide equal access to healthcare services for all Medicaid patients by maintaining coverage for safe, reliable transportation to medical services.

Thank you for considering our comments. If you have any questions or need any further information, please contact XXXX

Sincerely,

Figure 1

Medicaid Non-Emergency Medical Transportation Trips in 32 States, by Treatment Type (Nov. 2015 year-to-date)



SOURCE: LogisticCare Solutions, *Medicaid Gross Trips by Treatment Type* (Nov. 2015) (data available for 32 states).

